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**March 20, 2025**

**Via ECF**

Hon. Jesse M. Furman, USDJ  
United States District Court, SDNY  
40 Foley Square  
New York, NY 10007

**Re: Simoni v. The First Rate Group LLC et al**  
**Case No. 24-CV-05784 (JMF)(RWL)**  
**Motion to Adjourn, etc.**

Dear Judge Furman:

My firm represents plaintiff in the above-referenced action, and I respectfully write to request a 30-day adjournment of the March 26, 2025 pre-trial conference and related deadlines. This request is being made because on March 18, 2025, the single remaining/non-settling defendant in this case, Quality Concierge Services Inc., filed a motion seeking to compel mediation pursuant to a CBA and some additional time is needed to confer as to this request. No prior request for an adjournment of this conference was made.

I thank the Court in advance for its time and consideration.

Respectfully submitted,

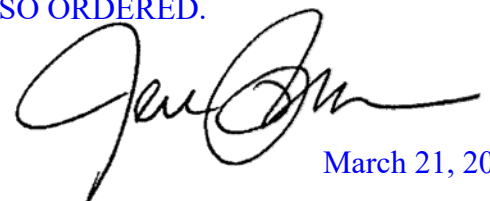
Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan  
By: Abdul K. Hassan, Esq. (AH6510)  
*Counsel for Plaintiff*

cc: **Defense Counsel via ECF**

Application GRANTED. The pretrial conference is hereby ADJOURNED to **April 30, 2025**, at **9:00 a.m.** Plaintiff shall file any opposition to the motion to compel mediation no later than **April 1, 2025**. Defendant's reply, if any, shall be filed no later than **April 8, 2025**. The Clerk of Court is directed to terminate ECF No. 43.

SO ORDERED.



March 21, 2025